

date that the lawsuit was filed. According to the allegations in Plaintiffs' Petition, the amount in controversy exceeds \$75,000.00. Stericycle has timely removed this action.

II. GROUNDS FOR REMOVAL

A. Timeliness of Removal.

On February 8, 2022, Plaintiffs filed the lawsuit styled *Adriana Bonner and Quentin Bonner, Jr. v. Stericycle Specialty Waste Solutions, Inc. a.k.a. Stericycle, Inc.*, Cause No. CC-22-00652-E, in the County Court at Law No. 5, Dallas County, Texas. Stericycle was served through its registered agent on February 12, 2022. Thus, this Notice of Removal is timely filed pursuant to 28 U.S.C. § 1446(b).

B. Diversity of Citizenship Exists Between Plaintiffs and Defendant.

Diversity of citizenship exists between Plaintiffs and Defendant. Therefore, this court has original jurisdiction pursuant to 28 U.S.C. § 1332(a)(1). Plaintiffs are citizens of the state of Texas. (See Pl.'s Orig. Pet. at p. 2, attached as Ex. A-1). Defendant Stericycle is a citizen of the states of Delaware and Illinois under 28 U.S.C. § 1332(c)(1) because it is a corporation incorporated under the laws of the state of Delaware and its principal place of business is in Bannockburn, Illinois. (See Pl.'s Orig. Pet. at p. 2 attached as Ex. A-1). Defendant Stericycle is not a citizen of Texas and was not a citizen of Texas prior to the date the lawsuit was filed.

C. The Amount in Controversy exceeds \$75,000.00.

Plaintiffs' Petition states that Plaintiffs are seeking monetary damages in excess of \$250,000. (See Petition at p. 1, attached as Ex. A-1).

D. State Court Filings.

In accordance with 28 U.S.C. § 1446(a) and Local Rule 81.1, the following documents are attached as Exhibits A - B:

(A) An index of all documents that clearly identifies each document and indicates the date the document was filed in state court with a copy of the documents filed behind the index; and

(B) A copy of the docket sheet in the state court action.

Further, pursuant to Local Rule 81.1, Defendant files contemporaneously herewith a civil cover sheet, a supplemental civil cover sheet and a separately signed certificate of interested persons, and Defendant Stericycle's filed answer in this Lawsuit prior to removal, which is attached hereto as Exhibit A-5.

III. VENUE AND NOTICES

Under 28 U.S.C. § 1441(a), venue of the removed action is proper in this Court as it is in the district and division embracing the place where the Lawsuit is pending. This Notice of Removal is being filed with the clerk of the District Court of Dallas County, Texas and is being served upon counsel for Plaintiffs pursuant to 28 U.S.C. §1446(d).

IV. PRAYER

WHEREFORE, PREMISES CONSIDERED, Defendant Stericycle, Inc. requests that this Court assume full jurisdiction of this cause in accordance with 28 U.S.C. § 1332(a)(1), and that further proceedings in the County Court at Law No. 5 of Dallas County, Texas be stayed, and prays for such other and further relief, in favor of Defendant, to which it may be justly entitled.

Respectfully submitted,

By: /s/ S. Wesley Butler

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**ATTORNEYS FOR DEFENDANT
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CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing has been served upon all counsel of record via electronic service, on this 8th day of March, 2022.

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/s/ S. Wesley Butler

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